

## EXHIBIT B

JOSEPH A. TURNER, P.C.

ATTORNEYS AT LAW  
1504 WEST AVENUE  
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\* JOSEPH A. TURNER  
THOMAS M. VASQUEZ

JEFF N. WILSON  
(1974 - 2006)

\* BOARD CERTIFIED CRIMINAL LAW  
TEXAS BOARD OF LEGAL SPECIALIZATION

April 4, 2014

Round Rock Police Department  
2701 N. Mays St.  
Round Rock, TX 78665

Re: Mr. William Slade Sullivan

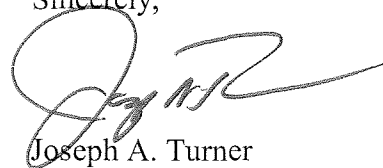
Dear Sir,

Broadus Spivey and I have been retained to represent the interest of William Slade Sullivan. In the early morning hours of March 21, 2014 we understand that officers of the Round Rock Police Department assaulted Mr. Sullivan. At the time, Mr. Sullivan was in the parking lot of Rick's Cabaret, located at 3105 S. Interstate 35, Round Rock. During the incident, and as a result of their actions, Mr. Sullivan sustained severe bodily injury.

We are requesting that you preserve all audio and video recordings related to this event. We also are requesting copies of these recordings. Any other information you may have related to the event would also be appreciated.

Please provide this information as promptly as possible.

Sincerely,



Joseph A. Turner

JAT/nt

## EXHIBIT B

### Sheets & Crossfield, P.C.

ATTORNEYS AT LAW  
309 East Main Street • Round Rock, TX 78664-5246  
Phone 512-255-8877 • fax 512-255-8986

April 17, 2014

Joseph A. Turner  
Attorney at Law  
1504 West Avenue  
Austin, Texas 78701

RE: Request for Records - William Slade Sullivan  
Round Rock Police Department

Dear Mr. Turner:

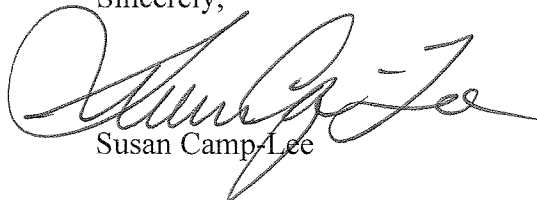
Our law firm represents the City of Round Rock, Texas. I am writing in response to your recent request made to the City of Round Rock pursuant to the Texas Public Information Act. The City believes that a portion of the records you requested are excepted or prohibited from disclosure by the Texas Public Information Act and has submitted a request for an open records decision to the Texas Attorney General. A copy of the City's correspondence to the Attorney General is enclosed.

Enclosed you will find copies of the remaining documents responsive to your request that are not being withheld pending that opinion. The costs associated with the production of the information **total \$1.49**, comprised of \$.30 for 3 copies at \$.10 per copy and \$1.19 for postage. Upon receipt, please forward the total amount in the form of a money order or check, **payable to the City of Round Rock**, to the following:

**City of Round Rock**  
**Sara White, City Clerk**  
**221 E. Main Street**  
**Round Rock, Texas 78664**  
**ATTN: Open Records Payment - 2884**

If you have any questions, please contact me.

Sincerely,



Susan Camp Lee

Enclosures

cc: Sara White, City Clerk

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### Sheets & Crossfield, P.C.

ATTORNEYS AT LAW  
309 East Main Street • Round Rock, TX 78664-5246  
Phone 512-255-8877 • fax 512-255-8986

COPY

April 17, 2014

Open Records Division  
Office of the Attorney General  
P.O. Box 12548  
Austin, Texas 78711-2548

RE: REQUEST FOR OPEN RECORDS DECISION

Dear General Abbott:

Our law firm represents the City of Round Rock, Texas ("City"). On April 4, 2014 the City received a request for police records related to a specific incident investigated by the Round Rock Police Department. A copy of the request is enclosed as Exhibit A. The request was for the following information:

"...William Slade Sullivan...March 21, 2014...parking lot of Rick Cabaret... all audio and video recordings related to this event...copies of these recordings. Any other information you may have related to the event..."

The incident referenced in the request is Round Rock Police Department case #14-0321-0007 which is a criminal investigation that resulted in arrest warrants being issued for Mr. Sullivan for Driving While Intoxicated and Interference with Public Duties. Those criminal cases are currently pending.

The City believes that a portion of the information responsive to the request is not subject to public disclosure pursuant to the Texas Public Information Act, except for the basic information regarding the offense as outlined in Houston Chronicle Publishing Co. v. City of Houston, 531 S.W.2d 177 (Tex.App.-Houston [14th Dist.] 1975), writ ref'd n.r.e. per curiam, 536 S.W.2d 559 (Tex. 1976) and Section 552.108(c) of the Texas Government Code. The information responsive to the request is enclosed as Exhibit B. The City is releasing the basic information.

#### Exhibit B

Section 552.108 of the Texas Public Information Act provides, in pertinent part;

- (a) Information held by a law enforcement agency or prosecutor that deals with the detection, investigation, or prosecution of crime is excepted from the requirements of Section 552.021 if:

## EXHIBIT B

(1) release of the information would interfere with the detection, investigation, or prosecution of crime;

.....

(b) An internal record or notation of a law enforcement agency or prosecutor that is maintained for internal use in matters relating to law enforcement or prosecution is excepted from the requirements of Section 552.021 if:

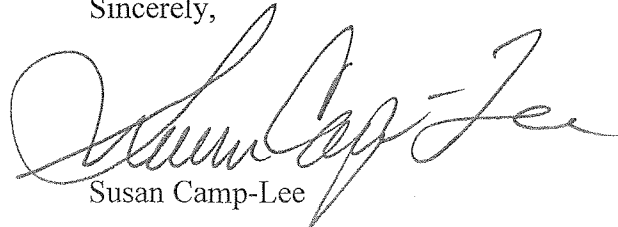
(1) release of the internal record or notation would interfere with law enforcement or prosecution;

.....

All of the information enclosed in Exhibit B is information held by a law enforcement agency that deals with the detection, investigation or prosecution of a crime. The information relates to an investigation of the charges of Driving While Intoxicated and Interference with Public Duties. Those criminal cases are currently pending. Public disclosure of the details of the investigation at this time would seriously hamper the investigative and prosecution efforts of the law enforcement agency in this case because it is a pending case that has not yet been fully investigated or prosecuted.

Please issue an opinion regarding whether or not the City is required to provide the information in Exhibit B. If you have any questions or need additional information, please feel free to contact me at the above number. Thank you for your consideration in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan Camp-Lee", written in a cursive style.

Susan Camp-Lee

Enclosures

cc: Joseph A. Turner  
Attorney at Law  
1504 West Avenue  
Austin, Texas 78701  
(w/out enclosures)

Sara White, City Clerk

**EXHIBIT B**

Agency Name <i>Round Rock Police Department</i>		<b>INCIDENT/INVESTIGATION REPORT</b>				Case# <i>14-0321-0007</i>			
ORI <i>TX 2460500</i>		** Contains Restricted Names **				Date / Time Reported <i>03/21/2014 03:37 Fri</i>			
Location of Incident <i>3105 S Ih 35, Round Rock TX 78664-</i>		Premise Type <i>Parking Lot/garage</i>		Zone/Tract <i>RRPD, D2</i>		Last Known Secure <i>03/21/2014 03:37 Fri</i>			
At Found <i>03/21/2014 03:37 Fri</i>									
<b>I N C I D E N T  D A T A</b>	#1	Crime Incident(s) <i>Driving While Intoxicated</i> <i>49.04</i>	(Com)  M	Weapon / Tools			Activity		
				Entry			Exit		
				Security					
	#2	Crime Incident <i>Interference With Public Duties</i> <i>38.15</i>	(Com)  M	Weapon / Tools			Activity		
				Entry			Exit		
				Security					
	#3	Crime Incident	( )	Weapon / Tools			Activity		
				Entry			Exit		
				Security					
<b>MO</b>									
<b>V I C T I M</b>	# of Victims <i>1</i>		Type: SOCIETY / PUBLIC		Injury:				
	Victim/Business Name (Last, First, Middle) <i>V1 State Of Texas</i>		Victim of Crime # <i>1</i>	DOB <i>Age</i>	Race	Sex	Relationship To Offender		
	Home Address				Home Phone				
	Employer Name/Address				Business Phone		Mobile Phone		
	VYR	Make	Model	Style	Color	Lic/Lis	VIN		
	CODES: V- Victim (Denote V2, V3) O = Owner (if other than victim) R = Reporting Person (if other than victim)								
<b>O T H E R  S  I N V O L V E D</b>	Type: INDIVIDUAL (NOT A LE OFFICER)				Injury:				
	Code <i>RP</i>	Name (Last, First, Middle) <i>RODRIGUEZ, ROLANDO ALEX</i> <i>Restricted</i>	Victim of Crime #	DOB <i>02/09/1984</i> <i>Age 30</i>	Race <i>W</i>	Sex <i>M</i>	Relationship To Offender		
	Home Address <i>3315 Winding Way Round Rock, TX 78664</i>				Home Phone <i>512-774-8391</i>				
	Employer Name/Address <i>Ricks Caberet Security (SECURITY GUARD)</i>				Business Phone <i>512- -</i>		Mobile Phone <i>512-774-1610</i>		
	Type:				Injury:				
	Code	Name (Last, First, Middle)	Victim of Crime #	DOB <i>Age</i>	Race	Sex	Relationship To Offender		
Home Address				Home Phone					
Employer Name/Address				Business Phone		Mobile Phone			
<b>P R O P E R T Y</b>	1 = None 2 = Burned 3 = Counterfeit / Forged 4 = Damaged / Vandalized 5 = Recovered 6 = Seized 7 = Stolen 8 = Unknown ("OJ" = Recovered for Other Jurisdiction)								
	VI #	Code	Status Frm/To	Value	OJ	QTY	Property Description	Make/Model	Serial Number
	<i>1-</i>	<i>999</i>	<i>EVID</i>	<i>\$0.00</i>		<i>1</i>	<i>PHOTO CD</i>		
	<i>1</i>	<i>9916</i>	<i>EVID</i>	<i>\$0.00</i>		<i>1</i>	<i>STATEMENT</i>	<i>STATEMENT</i>	
		<i>VEH</i>	<i>IMPO</i>	<i>\$0.00</i>		<i>1</i>	<i>2011 WHI, CVH0284 TX</i>	<i>FORD F350</i>	<i>1FT7W2BT1BEC15165</i>
Officer/ID# <i>ZOSS, N. J. (CHAR, C3) (1117)</i>									
Invest ID# <i>(0)</i>					Supervisor <i>OSBORN, L. M. (ADAM, A1) (816)</i>				
Status	Complainant Signature			Case Status <i>Active/open Pending/warrant</i>			Case Disposition: <i>Warrant Obtained</i>		Page 1

**EXHIBIT B**  
**INCIDENT/INVESTIGATION REPORT**

By: SHANCOCK, HANCOCK 04/07/2014

Page 3

Round Rock Police Department

Case# 14-0321-0007

Status Codes	1 = None	2 = Burned	3 = Counterfeit / Forged	4 = Damaged / Vandalized	5 = Recovered	6 = Seized	7 = Stolen	8 = Unknown
D R U G S	IBR	Status	Quantity	Type Measure	Suspected Type			Up to 3 types of activity

Assisting Officers  
 OSBORN, L.M. (816), JOHNSON, B.B. (4174), MOUNT, C.S. (1750), MAYO, K.A. (4182), BALLEW, A.P. (4178)

Suspect Hate / Bias Motivated:

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**NARRATIVE**

On 03-21-2014 at about 0337 hours, I responded to "Rick's," 3105 S IH 35, Round Rock, Travis County, Texas, about a reported intoxicated patron attempting to drive away from the establishment.

After conducting a field investigation, I obtained arrest warrants for William Sullivan for Intefering with the duties of a Public Servant and Driving While Intoxicated. This case is active/Warrant obtained.

**EXHIBIT B****Incident Report Suspect List**

Round Rock Police Department

OCA: 14-0321-0007

1	Name (Last, First, Middle) <i>SULLIVAN, WILLIAM SLADE</i>						Also Known As				Home Address <i>902 RANCH RD GEORGETOWN, TX 78628--000</i>																																									
	Business Address																																																			
	DOB. <i>01/14/1970</i>	Age <i>44</i>	Race <i>W</i>	Sex <i>M</i>	Eth <i>N</i>	Hgt <i>511</i>	Wgt <i>350</i>	Hair <i>BRO</i>	Eye <i>BLU</i>	Skin	Driver's License / State. <i>14405765 TX</i>																																									
	Scars, Marks, Tattoos, or other distinguishing features																																																			
<table border="1"> <tr> <td colspan="2"><i>Reported Suspect Detail</i></td> <td colspan="2">Suspect Age</td> <td>Race</td> <td>Sex</td> <td>Eth</td> <td colspan="2">Height</td> <td colspan="2">Weight</td> <td colspan="2">SSN</td> </tr> <tr> <td>Weapon, Type</td> <td>Feature</td> <td colspan="2">Make</td> <td colspan="2">Model</td> <td colspan="2">Color</td> <td>Caliber</td> <td colspan="2">Dir of Travel</td> <td colspan="2">Mode of Travel</td> </tr> <tr> <td colspan="2">Veh Yr/Make/Model</td> <td>Drs</td> <td colspan="2">Style</td> <td colspan="2">Color</td> <td colspan="2">Lic/St</td> <td colspan="2">VIN</td> <td colspan="2"></td> </tr> </table>														<i>Reported Suspect Detail</i>		Suspect Age		Race	Sex	Eth	Height		Weight		SSN		Weapon, Type	Feature	Make		Model		Color		Caliber	Dir of Travel		Mode of Travel		Veh Yr/Make/Model		Drs	Style		Color		Lic/St		VIN			
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Veh Yr/Make/Model		Drs	Style		Color		Lic/St		VIN																																											
Notes							Physical Char																																													